

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS and WILLIAM ZHANG,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DAN LARIMER,

Defendants.

Case No. 1:20-cv-02809-LAK

Honorable Lewis A. Kaplan

**NOTICE OF MOTION FOR APPOINTMENT OF LEAD PLAINTIFFS AND
APPROVAL OF SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that JD Anderson, David Muhammad, Rajith Thiagarajan, Chase Williams, and Token Fund I LLC respectfully move this Court (i) to appoint them lead plaintiffs in the above-captioned action and (ii) to approve their selection of Roche Cyrulnik Freedman LLP and Selendy & Gay PLLC as Co-Lead Counsel pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §77z-1(a)(3)(B)(i). A proposed order is attached to this notice and will be submitted to the Orders Clerk concurrently with this filing. In support of the motion, JD Anderson, David Muhammad, Rajith Thiagarajan, Chase Williams, and Token Fund I LLC rely upon the accompanying memorandum of law and any other written or oral argument as may be requested or permitted by the Court.

Dated: June 8, 2020
New York, New York

Respectfully submitted,

/s/ Philippe Z. Selendy

Philippe Z. Selendy
Jordan A. Goldstein
Joshua S. Margolin
Oscar Shine
SELENDY & GAY, PLLC
1290 Sixth Avenue, 17th Floor
New York, NY 10104
pselendy@selendygay.com
jgoldstein@selendygay.com
jmargolin@selendygay.com
oshine@selendygay.com

/s/ Kyle W. Roche

Kyle W. Roche
Edward Normand
Velvel (Devin) Freedman (pro hac pending)
Joseph M. Delich
ROCHE CYRULNIK
FREEDMAN LLP
99 Park Avenue, 19th Floor
New York, NY 10016
kyle@rcflp.com
tnormand@rcflp.com
vel@rcflp.com
jdelich@rcflp.com